

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

APRIL BAINTER, on behalf of herself and)
all others similarly situated,)

Plaintiff,)

v.)

AKRAM INVESTMENTS, LLC,)
MOHAMMAD MASWADI, MONTASER)
MASWADI AND THAER MASWADI)

Defendants.)

Case No. 1:17-cv-07064

Honorable Maria Valdez

**PLAINTIFFS' UNOPPOSED MOTION FOR APPROVAL OF SETTLEMENT, FOR
APPOINTMENT OF SETTLEMENT ADMINISTRATOR, AND FOR APPROVAL OF
SERVICE AWARDS AND ATTORNEYS' FEES AND COSTS**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Settlement, for Appointment of Settlement Administrator, and For Approval of Service Awards and Attorneys' Fees and Costs and the supporting exhibits, including the Joint Stipulation of Settlement, and the Declaration of Douglas M. Werman, Plaintiff, on behalf of herself and the Opt-in Plaintiffs (collectively, "Plaintiffs"), respectfully requests that the Court enter an Order:

- (1) approving the \$210,000 Settlement set forth in the Joint Stipulation of Settlement and incorporating the terms of the Joint Stipulation of Settlement;
- (2) approving an amount of \$10,000 to resolve the Named Plaintiff April Bainter's retaliation claim;
- (3) a Service Award in the amount of \$2,500.00 to the Named Plaintiff April Bainter for her service to Settlement Class Members;
- (4) Service Awards in the amount of \$500 each to Opt-in Plaintiffs Lymarie Colon Calzada and Hector Maisonet for their service to Settlement Class Members;
- (5) approving Plaintiffs' request for \$130,000.00 in attorneys' fees and reimbursement of \$1,733.76 in litigation expenses;

- (6) appointing Analytics Consulting, LLC as the Settlement Administrator and approving the request for \$3,936 for settlement administration fees and costs; and
- (7) dismissing this action without prejudice, with leave to reinstate on or before the conclusion of the check cashing period, and in the event a motion to reinstate is not timely filed, converting the dismissal to a dismissal with prejudice without further order of the Court.

Dated: October 3, 2018

Respectfully submitted,

/s/Maureen A. Salas

One of the Attorneys for Plaintiffs

Douglas M. Werman (dwerman@flsalaw.com)
Maureen A. Salas (msalas@flsalaw.com)
Werman Salas P.C.
77 West Washington Street, Suite 1402
Chicago, Illinois 60602
(312) 419-1008

Attorneys for Plaintiffs